

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

F I L E D
IN CLERK'S OFFICE
U.S. DISTRICT COURT
DISTRICT OF MASS.

PAN AMERICAN AIRWAYS CORP.,)
v.)
Plaintiff/Counter-Defendant,)
v.)
ROBERT E. BARNES,)
Defendant/Counter-Plaintiff.)
C.A. No. 04-CV-10515-JLT

**PLAINTIFF/COUNTER-DEFENDANT'S REPLY
IN OPPOSITION TO DEFENDANT/COUNTER-PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Rules 7 and 56 of the Federal Rules of Civil Procedure, and Local Rules 7.1(b) and 56.1 of the Rules of this Court, plaintiff/counter-defendant Pan American Airways Corporation (“Pan Am”) hereby replies in opposition to defendant/counter-plaintiff Robert E. Barnes’ (“Barnes”) motion for partial summary judgment. For the reasons stated herein and the memorandum in support of this reply in opposition, Pan Am respectfully requests that the motion be denied.

Pursuant to Local Rule 7.1(D), Pan Am respectfully requests oral argument on the motion and this reply.

Respectfully submitted,



Robert B. Culliford (BBO# 638468)
14 Aviation Avenue
Portsmouth, NH 03801
(603) 7660-2002

Attorney for plaintiff
Pan American Airways Corp.

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